

JAP:TF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X 12-581 M

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18 U.S.C. § 1546)

AHAMEFULA NWANKWO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

THOMAS CHRISTIAN, being duly sworn, deposes and states that he is a Special Agent with the Department of State ("DOS"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 16, 2012, within the Eastern District of New York, the defendant AHAMEFULA NWANKWO, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

1. My information comes from a joint investigation of the DOS and the United States Customs and Border Protection agency ("CBP"). I have spoken with CBP agents, interviewed the defendant and reviewed documents.

2. On June 16, 2012, the defendant AHAMEFULA NWANKWO arrived at John F. Kennedy International Airport on Delta Airlines Flight 71 from Lagos, Nigeria. Upon arrival, the defendant presented a valid Nigerian passport, No. A03627605. The passport contained a valid B1/B2 visa, Visa Foil No. F2076523.

3. The defendant AHAMEFULA NWANKWO was referred to secondary inspection by CBP for a random check for narcotics trafficking. During that secondary inspection, the defendant AHAMEFULA NWANKWO said he was here to attend an academic conference. CBP called a person that the defendant provided as a contact for the conference, and the contact person said he had never heard of the defendant and had no records for him. The defendant was presented with this information, and told CBP, in sum and substance, that he was here to work illegally, not to attend a conference.

4. The defendant AHAMEFULA NWANKWO was notified of his Miranda rights, which he waived in writing. The defendant AHAMEFULA NWANKWO then stated, in sum and substance, that he was here to work illegally, not to attend a conference, and that he paid a vendor in Nigeria \$2,200 for the academic conference

admission letter and business cards to support his visa application.

WHEREFORE, your deponent respectfully requests that the defendant AHAMEFULA NWANKWO be dealt with according to law.

S/ Thomas Christian

THOMAS CHRISTIAN
Special Agent
United States Department of State

Sworn to before me this
18th day of June, 2012

S/ Viktor Pohorelsky

United States Magistrate Judge
Eastern District of New York